

respectfully reserve the right to request additional jury instructions or modifications of the attached instructions at trial.

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Respectfully submitted,

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TABLE OF JURY INSTRUCTIONS

**NINTH CIRCUIT
MODEL JURY**

<u>NO.</u>	<u>INSTRUCTIONS</u>	<u>DESCRIPTION</u>
1	1.12	OUTLINE OF TRIAL
2	2.2	BENCH CONFERENCES AND RECESSES
3	2.3	STIPULATED TESTIMONY
4	2.4	STIPULATIONS OF FACT
5	2.5	JUDICIAL NOTICE
6	2.7	TRANSCRIPT OF RECORDING IN ENGLISH
7	3.12	SEPARATE CONSIDERATION OF MULTIPLE
8		COUNTS
9	4.1	STATEMENTS BY DEFENDANT
10	4.3	OTHER CRIMES, WRONGS OR ACTS OF
11		DEFENDANT
12	4.9	TESTIMONY OF WITNESSES INVOLVING
13		SPECIAL CIRCUMSTANCES – IMMUNITY,
14		BENEFITS, ACCOMPLICE, PLEA
15	4.17	OPINION EVIDENCE, EXPERT WITNESS
16	5.6	KNOWINGLY
17	7.6	COMMUNICATION WITH COURT
18	8.112	FALSE DECLARATION BEFORE GRAND JURY
19	Special #1	OBSTRUCTION OF JUSTICE